

# **EXHIBIT**

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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN)  ECF Case
This document relates to:  <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN)  ECF Case

**DECLARATION OF CARMELA HARRISON**

I, CARMELA HARRISON, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today.

Attached as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.

3. On September 11, 2001, I was present on the 90<sup>th</sup> Floor of Two World Trade Center when the terrorist attacks on the World Trade Center occurred.

4. I was employed by Fiduciary Trust Company International on September 11, 2001. I was working at my desk when the first plane struck One World Trade Center.

5. During the slow descent down the stairs of Two World Trade Center, the second plane struck the building, knocking me down in the stairwell. Some who were above me on the stairs landed on top me.

6. As a result of the attacks occurring at the World Trade Center on September 11, 2001, I received traumatic back injuries. In addition, I witnessed atrocities beyond the imagination of the average citizen. The situation could only be compared to a war zone. I was going about my everyday life in a peaceful manner when we were brutally attacked by terrorists and my life was altered forever.

7. I suffered the following specific injuries on September 11, 2001: back injury (including but not limited to vertebrae L1-L5), neck injury, nerve damage in my arm, and I have suffered with post-traumatic stress disorder (“PTSD”).

8. I have continued to suffer from agonizing back pain since the attacks. In addition, I have nightmares on a regular basis and have suffered severe emotional distress. The quality of my life deteriorated significantly — both physically and emotionally and I continue to suffer daily.

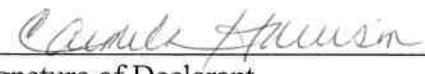
9. I sought and continue to seek medical attention for my injuries, including physical therapy, joint injections, and acupuncture, and I underwent numerous MRIs and X-rays. Attached as Exhibit B to this Declaration is a true and correct copy of my selected relevant medical records related to the treatment that I received following the September 11, 2001 terrorist attacks.

10. I suffered, and continue to suffer, severe emotional distress as a result of the above terrorist attacks and participate in counseling for PTSD.

11. I previously pursued a claim (Claim Number VCF Unknown) through the September 11<sup>th</sup> Victim Compensation Fund specifically related to my physical injuries incurred on September 11, 2001, and my claim was determined to be eligible for compensation.

I declare UNDER PENALTY OF PERJURY that the foregoing is true and correct.

EXECUTED on this 26<sup>th</sup> day of (*December 2019/January 2020*).

  
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Signature of Declarant

**EXHIBITS  
FILED  
UNDER SEAL  
(ECF No.  
5716)**